

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF OKLAHOMA**

1. GREAT LAKES INSURANCES SE)

Plaintiff,)

vs.)

Case No: 5:22-cv-00702-JD

2. FREDY VALLE d/b/a VALLE)
TRUCKING,)

3. SILVER STAR CONSTRUCTION)
COMPANY, INC.,)

4. TYLON MACKEY,)

5. ISRAEL JUAREZ,)

6. ORD TRUCKING, INC., and)

7. ZURICH AMERICAM INS. CO.,)

Defendants.)

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8. ZURICH AMERICAN INS. CO.)

Third-Party Plaintiff))

9. BERKSHIRE HATHAWAY)
HOMESTATE INS. CO., and)

10. PROGRESSIVE NORTHERN)
INS. CO.)

Third-Party Defendants.)

THIRD-PARTY DEFENDANT PROGRESSIVE NORTHERN INSURANCE COMPANY’S
WITNESS LIST

Third-Party Defendant Progressive Northern Insurance Company (“Progressive”) hereby
submits its Final Witness List.

Name & Contact Information	Subject(s) of Testimony
Representative of Great Lakes c/o counsel	Knowledge of the facts and circumstances underlying the subject lawsuit, CJ-2020-233 (Payne), specifically the insurance policy issued to Valle Trucking. May be Called.
Carly Tucker, c/o counsel for Great Lakes	Knowledge of the facts and circumstances underlying the subject lawsuit, CJ-2020-233 (Payne), specifically the insurance policy issued to Valle Trucking. May be Called.
Fredy Valle c/o counsel	Knowledge of the facts and circumstances underlying the subject lawsuit, CJ-2020-233 (Payne), specifically the insurance policy issued to him by Great Lakes. May be Called.
Representative of Silver Star Construction Co. c/o counsel	Knowledge of the facts and circumstances underlying the subject lawsuit, CJ-2020-233 (Payne), specifically the Hauling Agreement between it and Valle Trucking. May be Called.
Representative of Zurich American Ins. Co. c/o counsel	Knowledge of the facts and circumstances underlying the subject lawsuit, CJ-2020-233 (Payne), specifically the insurance policy it issued to Fredy Valle. May be Called.
Representative of Progressive Northern Ins. Co. c/o counsel	Knowledge of the facts and circumstances underlying the subject lawsuit, CJ-2020-233 (Payne), specifically the insurance policy it issued to Fredy Valle. May be Called.
Julie Kenney, c/o counsel for Progressive Northern Ins. Co.	Knowledge of the facts and circumstances underlying the subject lawsuit, CJ-2020-233 (Payne), specifically the insurance policy it issued to Fredy Valle. May be Called.
Eric Barnes, c/o counsel, c/o counsel for Progressive Northern Ins. Co.	Knowledge of the facts and circumstances underlying the subject lawsuit, CJ-2020-233 (Payne), specifically the insurance policy it issued to Fredy Valle. May be Called.
Tylon Mackey c/o counsel	Knowledge of the facts and circumstances underlying the subject lawsuit, CJ-2020-233 (Payne). May be Called.
Israel Juarez c/o counsel	Knowledge of the facts and circumstances underlying the subject lawsuit, CJ-2020-233 (Payne). May be Called.

ORD Trucking, Inc. c/o counsel	Knowledge of the facts and circumstances underlying the subject lawsuit, CJ-2020-233 (Payne). May be Called.
Witnesses identified by Great Lakes in response to ZAIC's discovery requests. May be Called.	
Witnesses identified by ongoing discovery in this action. May be Called.	
Witnesses identified by ongoing discovery in the underlying action. May be Called.	
Witnesses that have yet to be identified, including experts. May be Called.	
Witnesses listed by other parties, which are not objected to by Progressive. May be Called.	
Witnesses necessary for: rebuttal, impeachment, and necessary to authenticate or sponsor any exhibit. May be Called.	
Progressive reserves the right to endorse additional witnesses identified during discovery. May be Called.	

Respectfully submitted,

STARR, BEGIN, & KING, PLLC

s/Bradley E. Bowlby

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Attorney for Def. Progressive Northern Ins. Co.

CERTIFICATE OF SERVICE

I hereby certify that on September 19, 2023, I electronically transmitted the attached document to the Clerk of Court using the Electronic Case Filing System for filing. Based on the records currently on file in this case, the Clerk of Court will transmit a Notice of Electronic Filing to those registered participants of the ECF System.

s/Bradley E. Bowlby